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Federal Communications Commission
Office of Secretary
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July 15, 1999

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VIA FEDERAL EXPRESS

Margalie Salas
Portals II
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Washington, DC 20554

Common Carrier Bureau
Network Service Division
Office of the Chief

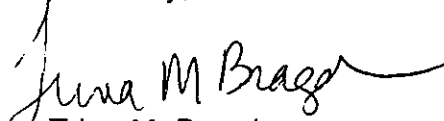
Re: ~~NSD-L-99-028~~
DA 99-108

CC DOCKET: 96-98
NSD-L-98-136

Dear Ms. Salas:

Enclosed for filing please find an original and 4 copies of the Maine Public Utilities Commission's Reply Comments in Support of the Petition of the California Public Utilities Commission and the People of the State of California for a Delegation of Additional Authority Pertaining to Area Code Relief and to NXX Code Conservation Measures.

Sincerely,


Trina M. Bragdon

CC: Al McCloud
Service List (via U.S. Mail)

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List ABCDE



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JUL 23 1999

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

Federal Communications Commission
Office of Secretary

In the Matter of: : DA 99-108
: NSD File No. L-~~99-928~~
Petition of the California Public Utilities : 98-136
Commission and the People of the :
State of California for a Delegation :
of Additional Authority Pertaining :
to Area Code Relief and to NXX Code :
Conservation Measures :

**REPLY COMMENTS OF THE MAINE PUBLIC UTILITIES
COMMISSION IN SUPPORT OF THE PETITION OF THE
CALIFORNIA PUBLIC UTILITIES COMMISSION AND THE
PEOPLE OF THE STATE OF CALIFORNIA FOR A
DELEGATION OF ADDITIONAL AUTHORITY PERTAINING TO
AREA CODE RELIEF AND TO NXX CODE CONSERVATION MEASURES**

The Maine Public Utilities Commission (MPUC) respectfully requests that the Common Carrier Bureau (CCB) grant the Petition of the California Public Utilities Commission and the People of the State of California (collectively, California) For a Delegation of Additional Authority Pertaining to Area Code Relief and to NXX Code Conservation Measures (Petition). Repeated changes in area codes subject both residential and business customers to unwarranted and unnecessary financial burdens as well as to significant inconveniences. California should be given the authority to ensure that consumers do not continue to bear the brunt of the Industry's lack of willingness to administer number resources more efficiently.

I. Immediate Action Is Needed

The MPUC urges the CCB to act on California's Petition as soon as possible so that California may take immediate steps to alleviate the current numbering crisis. There is no time to lose; with each passing day and each new area code that is implemented, irreparable harm occurs. Geographic associations are lost forever, consumers are burdened with unnecessary costs and inconvenience, and the NANP draws closer to complete exhaustion.

The CCB should grant California's request to begin a mandatory thousand block pool. Current estimates of the time to implement pooling range from six to eighteen months. Given this long lead-time, it is essential that states like California and Maine be given authority now to start the planning process so that pooling can begin within the next year. If the CCB waits until the FCC issues an order in its Number Resource Optimization docket¹ (likely to be sometime early next year) before allowing states to begin planning for thousand block pooling, it will be 2001 before the initial implementation of pooling. States like California, Maine, Massachusetts, New York, and Florida should not be precluded from moving forward on thousand block pooling at this time; its effectiveness has already been established, a national protocol already exists, and the underlying technology is already in place.

¹ Numbering Resource Optimization, *Notice of Proposed Rulemaking*, CC Docket No. 99-200, FCC 99-122 (June 2, 1999).

II. National Uniformity Does Not Preclude State Participation In Numbering Administration Issues

The CCB should also immediately grant California's other requests and allow California to implement conservation measures, at least on an interim basis, that are consistent with the FCC's tentative conclusions in the Numbering NPRM. Contrary to Industry's claims, national uniformity does not require a final FCC rule before conservation measures can be implemented. All of the measures proposed by California have already been explored by NANC and by many states. None will compromise the integrity of the North American Numbering Plan (NANP) or "interfere with the on-going efforts to put into place national numbering optimization policies," as claimed by SBC Communications.

Indeed, many of the measures proposed by California are similar to those requested by the MPUC in its Petition for Additional Authority to Implement Number Conservation Measures, DA No. 99-638. The MPUC has already shown why such measures are consistent with existing national policies and will not repeat those arguments here. See MPUC's Reply Comments in DA No. 99-638 (filed on May 17, 1999). Now that the FCC has issued its NPRM, it is clear that both the California and Maine proposals are consistent with the direction the FCC intends to take on these issues.

The MPUC has also shown that national uniformity does not preclude state involvement in number administration issues and that such involvement can be very effective. The MPUC's participation in numbering issues in Maine has already benefited both the Industry and the public by ensuring a more accurate COCUS forecast and saving more than 75 central office codes since

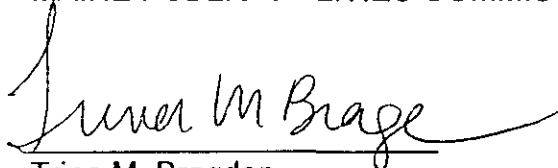
January. All of this has been done without violating any of the current national policies and guidelines. See MPUC Reply Comments in DA No. 99-638. In short, allowing California to address the numbering crisis in its state can be expected to produce significant public benefits.

III. CONCLUSION

Current conditions in individual states require immediate action to protect consumers from the unnecessary expense and confusion associated with new area codes, as well as to ensure that sufficient numbering resources are available to all carriers actually providing facilities-based services within a rate center. States should not be required to wait until a specific national solution is developed. Instead, states like Florida, Maine, Massachusetts, New York, and California should be given authority to implement number conservation measures which are consistent with current and anticipated national numbering policies. Accordingly, the MPUC respectfully requests that the CCB grant California's Petition.

Respectfully submitted,

MAINE PUBLIC UTILITIES COMMISSION

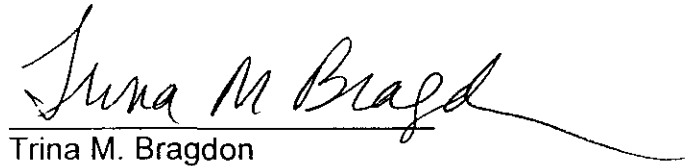
A handwritten signature in cursive script, reading "Trina M Bragdon", written over a horizontal line.

Trina M. Bragdon
Staff Attorney

Dated: July 15, 1999

CERTIFICATE OF SERVICE

I, Trina M. Bragdon, certify that a copy of the Reply Comments of the Maine Public Utilities Commission in Support of the Petition of the California Public Utilities Commission and the People of the State of California For a Delegation of Additional Authority Pertaining to Area Code Relief and to NXX Code Conservation Measures was served today, *via* U.S. mail, on the persons listed on the attached service list.


Trina M. Bragdon

Dated: July 15, 1999